REMARKS

Claims 1-25 are pending. Reconsideration of presently pending Claims 1-25 is respectfully requested in light of the remarks that follow.

Allowable Subject Matter

Applicants note with appreciation the indication in the Office Action that Claims 4-9, 15-17 and 22 are directed toward allowable subject matter, and are objected to only for being dependent upon a rejected base claim. These allowable claims each depend directly or indirectly from one of independent Claims 1,12, and 20. Independent Claims 1, 12, and 20 are each believed to be allowable for reasons discussed later. Accordingly, it is believed to be unnecessary to rewrite Claims 4-9, 15-17 and 22 in independent form at this time.

Objection to the Specification

The Office Action objects to the specification on the ground that the specification does not include a "summary of the invention" section. Applicants note that this is the second time this objection has been raised. In particular, the Examiner previously raised this objection in an Office Action mailed on March 1, 2007, and then withdrew the objection after being reminded of the language of the MPEP in a Response filed on May 1, 2007, and after a telephone conference involving the Examiner and also Supervisory Primary Examiner Rones. As the Examiner has chosen to again raise this same objection, this ground of objection is again respectfully traversed.

More specifically, there is no requirement for a "summary of the invention" in the patent statute, the rules, or the MPEP. The applicable statutory section (35 U.S.C. §112, first paragraph) requires only that the specification include a written description that is enabling and that discloses Applicants' best mode of practicing the invention. No mention is made in §112 of any requirement for a summary. Although a summary is mentioned in MPEP §608.01(a) as part of a "preferred" style for the specification, it is clearly permissive rather than required. MPEP §608.01(a) even indicates that it is permissible for Applicants to optionally include a sub-heading such as "Brief Summary of the Invention", followed simply by the words "Not Applicable" and no other text. For these reasons, it is respectfully submitted that the Examiner's objection to the absence of a summary section is without basis, and must be withdrawn.

Compliance With 35 U.S.C. § 101

a) Objection to Claims 1-11 under 35 U.S.C. §101

The Office Action objects to Claims 1-11 on the ground that they are not directed to statutory subject matter under 35 U.S.C. §101. Applicant notes that this is the second time an objection or rejection under §101 has been raised. For example, the Examiner previously raised a §101 rejection in an Office Action mailed on March 1, 2007. That rejection was withdrawn after the Response of May 1, 2007, and after the subsequent telephone conference between Applicant's counsel, the Examiner, and Supervisory Primary Examiner Rones. As the Examiner has now chosen to resort to §101 again, this objection is again respectfully traversed.

In particular, the Office Action asserts that independent Claim 1 "deals with simple mathematical abstract ideas and can be achieved with a **paper and pencil**" (emphasis in original). However, that is not the proper legal standard. The current standard for statutory subject matter under §101 was set by *State Street Bank & Trust Co. v. Signature Financial Group. Inc.*, 149 F.3d 1368, 47 USPQ2d 1596 (Fed Cir. 1998). Under *State Street*, a claim qualifies as statutory subject matter under §101 if it recites a "practical application," such that it accomplishes "a useful, concrete and tangible result." (*State Street*, 149 F.3d at 1373-74, 47 USPQ2d at 1601-02.)

Applying the *State Street* standard, Claim 1 recites "applying the access rules in the list to enforce policies and permissions to control access to various network resources." Controlling access to network resources has the useful, concrete and tangible result that people are either let into a network or they are not. This has the real world value of protecting network security from intruders. Thus, Claim 1 complies with the requirements of §101 and recites statutory subject matter. For this sole and independent reason, it is respectfully submitted that the Examiner's objection to Claims 1-11 is without basis and must be withdrawn.

Claim 1 is also statutory even under the Examiner's "paper and pencil" description of patentability. In particular, the claim recites "network resources." Networks, let alone "network resources", are not mathematical abstract ideas and cannot be achieved in any way using only a paper and pencil. It is also impossible to "apply" access rules using a paper and pencil in a way that "enforce[s] policies and permissions to control access" as recited in the claim. Controlling

access to network resources has the useful, concrete and tangible result of allowing or disallowing access to physical networks and pieces of network-connected equipment. This cannot be accomplished in any way using only a paper and pencil. Claims 2-11 depend from Claim 1 and thus are similarly compliant with 35 U.S.C. §101. For these additional and independent reasons, it is respectfully submitted that the Examiner's objection to Claims 1-11 is without basis and must be withdrawn.

b) Rejection of Claims 12-19 under 35 U.S.C. §101

The Office Action rejects Claims 12-19 under §101. This rejection is unclear because it has two inconsistencies. First, the initial sentence of paragraph 5 states that Claims 12-19 are rejected under 35 U.S.C. §101, but then the second sentence discusses "[i]ndependent claim 1." Applicant assumes that this inconsistency is a typographical error, and that paragraph 5 is supposed to apply to independent Claim 12, and not Claim 1.

Second, the initial sentence of paragraph 5 asserts that Claims 12-19 are rejected under §101 because "none of the claims are directed to software per se" (emphasis added). But this is inconsistent with the next sentence of paragraph 5, which (as best understood) asserts that Claim 12 "is claiming a computer software per se." (emphasis added.) If Claim 12 is not directed to software per se, then rejecting it for being software per se is logically inconsistent. Since this rejection is not clear and makes no sense, it is respectfully submitted that it should be withdrawn.

Assuming that the Examiner meant to assert Claim 12 is directed to software per se, the rejection is respectfully traversed. In more detail, Applicants note that "software per se" is not the standard for statutory subject matter under §101. Instead, a claim qualifies as statutory subject matter under §101 if it recites a "practical application", for example by accomplishing "a useful, concrete and tangible result." (*State Street* at 1601-02.)

Applying the *State Street* standard, Claim 12 recites a "rule enforcing engine" for "enforcing policies and permissions for controlling access to various network resources." Controlling access to network resources has the useful, concrete and tangible result that people are either let into the network or they are not. This has the real world value of protecting network security from intruders. Thus, Claim 12 complies with the requirements of §101 and recites

statutory subject matter. For this sole and independent reason, it is respectfully submitted that the Examiner's rejection of Claims 12-19 is without basis and must be withdrawn.

Further, it is evident that Claim 12 recites more than software. Claim 12 also recites a "rule enforcing engine" for "enforcing policies and permissions for controlling access to various network resources." By way of example and not limitation, the specification says that the "rule enforcing engine may ... allow or deny access request from network 570 to network 580 based on the result of accessing the rule base 550, for example." (Paragraph [0032], emphasis added.) The rule enforcing engine recited in Claim 12 is operatively coupled to at least one network, such that it can carry out its recited task of "controlling access to various network resources". Accordingly, Claim 12 is directed to more than just software per se, and is statutory.

Claim 12 also recites a "computer system". By way of example and not limitation, the specification discusses "a personal computer (PC), a server, a terminal, a personal digital assistant (PDA), or a mobile phone. The computer system may also make use of volatile memory such as RAM, for example, and non-volatile memory such as a hard disk drive or a flash memory device, for example." (Paragraph [0033].) The "computer system" recited in the claim is a concrete, tangible, real-world piece of equipment. The recitation of this computer system in the claim shows that the claim is not software per se. For these additional and independent reasons, it is respectfully submitted that the §101 rejection of Claim 12 is without basis and must be withdrawn.

Claims 13-19 depend from Claim 12 and are thus similarly compliant with 35 U.S.C. §101. Notice to that effect is respectfully requested.

c) Rejection of Claims 20-25 under 35 U.S.C. §101 for lack of a "specific and substantial asserted utility or a well established utility"

Claims 20-25 stand rejected under 35 U.S.C. §101 as not being supported "by either a specific and substantial asserted utility or a well established utility." The rejection is respectfully traversed, because it is improper for two separate and independent reasons.

First, Claim 20 recites "enforcing policies and permissions for controlling access to various network resources." This is a "specific and substantial asserted utility" as required by §101, and Claims 21-25 inherit this utility by virtue of their dependency. For this sole and

independent reason, the rejection is improper and should be withdrawn. Notice to that effect is respectfully requested.

Second, MPEP §706.03(a) provides form paragraph 7.05.04 for making an assertion that a claim lacks utility under 35 U.S.C. §101. In that form paragraph, specifically at the spot marked by the bracketed three (**[3]**), examiners are directed to "insert the explanation as to why the claimed invention is not supported by either a specific and substantial asserted utility or a well established utility" (See Examiner Note 2(c)). The Examiner has not done so here, and thus has not met the burden required for a proper rejection under 35 U.S.C. §101. For this sole and independent reason, the rejection is improper and should be withdrawn. Notice to that effect is respectfully requested.

The Office Action also asserts that the phrase "computer readable medium" in Claims 20-25 is not supported by the specification. This assertion is traversed, for reasons discussed below relative to compliance with 35 U.S.C. §112.

Compliance With 35 USC § 112

Claims 20-25 are rejected under 35 USC 112, first paragraph, as failing to comply with the written description requirement. In particular, the Examiner asserts that the disclosure does not support the phrase "computer readable medium." This rejection is respectfully traversed. By way of example and not limitation, the specification says that:

> The computer system may also make use of <u>volatile memory such
> as RAM</u>, for example, and <u>non-volatile memory such as a hard
> disk drive or a flash memory device</u>, for example." (Paragraph
> [0033], emphasis added.)

These enumerated computer system elements (RAM, a hard disk drive and a flash memory device) are each a computer readable medium, and provide support for the claimed "computer readable medium." Claims 21-25 depend from Claim 20 and are thus similarly compliant with 35 U.S.C. §112. Thus, the rejection is improper and should be withdrawn. Notice to that effect is respectfully requested.

Non-Obviousness Under 35 USC § 103

Independent Claims 1, 12, and 20 are each rejected under 35 U.S.C. 103(a) as being obvious over Harsham U.S. Patent No. 6,041,347 in view of Nguyen U.S. Patent Application Publication No. 2003/0172145, and further in view of Pham U.S. Patent No. 7,143,288. These rejections are respectfully traversed, for the following reasons.

a) The Office Action does not establish a prima facie case of obviousness because the references are not properly combinable.

The Office Action asserts that independent Claims 1,12, and 20 are all obvious over a combination of the Harsham, Nguyen, and Pham references. However, MPEP §2145 X(D)(2) teaches that: "It is improper to combine references where the references teach away from their combination" (capitalization normalized). Harsham and Nguyen are not properly combinable under MPEP §2145 because Nguyen and Harsham give opposite prescriptions as to how to solve problems of growth and scalability.

More specifically, Nguyen states that early ISPs were not able to "scale their systems capacity" because they "combined the few required applications onto a single server" and pursued a "monolithic architecture design," and Nguyen proposes a distributed architecture. Nguyen at paragraph [0005], abstract. In contrast, Harsham states that "management of very large computer networks that are geographically dispersed is a difficult task" and prescribes a "centralized computer network management system." Harsham, col 1, ll. 39-41, 48-50.

Thus, Harsham teaches against Nguyen's distributed system, and Nguyen teaches against Harsham's centralized system. Because Harsham and Nguyen have diametrically opposite approaches to achieving the purported result of greater "growth and agility," the Examiner's suggestion to combine these references under §103 in order to achieve this result is improper under MPEP §2145 X(D)(2), and constitutes clear error.

Adding Pham does not cure this deficiency, because Pham has not been applied (and does not apply) to the two approaches to scalability. For this sole and independent reason, the indicated references are not properly combinable, and so the rejection of Claims 1, 12, and 20 under §103 must be withdrawn.

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b) The Office Action does not establish a prima facie case of obviousness because the references are not analogous art.

The Office Action asserts that Claims 1, 12, and 20 are obvious over a combination of Harsham, Nguyen, and Pham. However, MPEP §2141.01(a)(I) states that: "To rely on a reference under 35 U.S.C. 103, it must be analogous prior art." As one important aspect of this, the Examiner must "consider similarities and differences in structure and function." (capitalization and punctuation normalized.) Harsham, Nguyen, and Pham are not combinable under §103 because they have differences in structure and function that show that they are in non-analogous areas of the art.

More specifically, Pham is directed to a "security file system layer interposed between the platform operating system kernel and file system." (Pham, abstract.) As described by Pham, the security filesystem layer is at the very lowest layer of the operating system, directly integrated with the kernel on a single machine. In contrast, Nguyen is directed to a multi-machine distributed ISP architecture (Nguyen at paragraph [0005], abstract), and Harsham is directed to a "centralized computer network management system that simultaneously configures and monitors computers in a computer network."

In this case, the differences in structure and function could not be more striking. Pham operates at the *kernel* level to secure filesystems. Harsham operates at the *application* level to configure machines. Nguyen operates at the *network* level as a service provider architecture. As demonstrated in the table below, the disconnect between Harsham's, Nguyen's, and Pham's systems is so severe that the suggested integration of the three references is completely without merit:

	Harsham	**Nguyen**	**Pham**
Structure	Application	Large network	Operating system kernel
Function	Configure computers	ISP service provider	Secure filesystem access

Accordingly, the Examiner's suggestion to combine these three non-analogous references under §103 is improper under MPEP §2141.01(a), and constitutes clear error. For this sole and independent reason, the references are not combinable and so the rejection under §103 must be withdrawn.

c) The Office Action does not establish obviousness because all elements have not been shown in the prior art.

In *KSR International Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 82 USPQ2d 1385 (2007), the United States Supreme Court addressed the issue of obviousness, and explained that:

> A patent composed of several elements is not proved obvious merely by demonstrating that each element was, independently, known in the prior art. . . . [I]t can be important to identify a reason that would have prompted a person of ordinary skill in the art to combine the elements as the new invention does. (*KSR* at 1731, 82 USPQ2d at 1389)

In other words, after carrying the initial burden of showing that all of the claim elements are known in the prior art, an examiner must do more. But here, the Examiner has not met even the initial burden of "demonstrating that each element was, independently, known in the prior art." Specific examples are given below with respect to each independent claim.

1) Independent Claim 1

      i)   Claim 1 of the present application recites "ordered access rules." In rejecting Claim 1, paragraph 11 of the Office Action does not describe (or even use the words) "ordered access rules". It only mentions "rules which define configuration parameters." The Examiner has not shown any way in which "configuration parameters" are similar to "ordered access rules." In fact, the phrases "access rule" and "ordered access rule" *do not appear anywhere* in the Harsham, Nguyen, or Pham references. It is impossible for the Office Action to assert that Claim 1 is obvious over Harsham, Nguyen, or Pham if the Office Action does not

show that each claim element was independently known in the prior art, as discussed in *KSR v. Teleflex*. For this sole and independent reason, the rejection is improper and must be withdrawn.

     ii) Claim 1 of the present application recites an "access control list" that is "configured to contain independent rule blocks having ordered access rules." The Office Action, however, does not mention the term "access control list," and thus can't even attempt to identify an access control list that might "contain" or "hold" independent rule blocks. Further, the Office Action doesn't apply any references to explain how the rule blocks might "have ordered access rules." As the Examiner does not apply *any* reference to teach how the access control list might "contain" or "hold" independent rule blocks, or how the independent rule blocks have "ordered access rules," the Office Action does not show that each element of Claim 1 was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

     iii) Claim 1 of the present application recites that "if the list is empty, creating a new independent rule block and inserting the new access rule therein." Paragraph 11 of the Office Action asserts that these limitations are taught by Nguyen at page 15, paragraph [0434]. This cited text in Nguyen states that:

> Another consideration may be: is the design to include a router Access Control List (ACL) and packet filters? Many ISPs choose to omit firewalls and implement router ACL and packet filters instead. Considerations on whether to implement a firewall or router ACL and packet filters may include one or more of, but are not limited to, the following: routers are stateless and do not examine payload, and firewalls are necessary for stateful applications.

There is no reasonable interpretation of this quoted language that would amount to "creating a new independent rule block," "inserting," or conditioning the insertion on the emptiness of a "list." As Nguyen completely fails to show "creating a new independent rule

block," "inserting" the block, or conditioning the insertion on the emptiness of a "list," the Office Action does not show that each element of Claim 1 was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

iv)   Claim 1 of the present application recites "a set of mapped independent rule blocks." (emphasis added.) Paragraph 11 of the Office Action asserts that this limitation is taught by Harsham at col. 4, lines 25-28. The cited text in Harsham states that, "[a]ccordingly, in the present invention, various logical groups of individual machines and groups of machines in the computer network may be defined" (Harsham, col. 4, ll. 25-18). However, the Examiner has not shown how the cited section of Harsham teaches "rule blocks" that are "mapped," "independent" or in a "set." The Examiner does not apply any other reference to teach "rule blocks" that are "mapped," "independent" or in a "set." As the Examiner does not apply *any* reference to teach "rule blocks" that are "mapped," "independent" or in a "set," the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

v) Claim 1 of the present application recites "merging the blocks in the set to form a new independent rule block and inserting the new access rule therein." Paragraph 11 of the Office Action asserts that this limitation is taught by Pham at Fig. 2 and in col. 6, lines 31-33. The cited text in Pham states that:

> While using RPC-based messages functionally similar to the NFS
> protocol, the requirements for formal NFS compatibility are
> obviated and both server and client communications functions can
> be merged into a single, concisely defined secure virtual file
> system layer (SVFS).

Although the word "merging" appears in this text, the text describes merging "server and client communications functions," *not* merging "rule blocks" as recited in Claim 1. Further, the Office Action and Pham completely fail to mention "inserting the new access rule" into a merged

block as recited by Claim 1. Thus, the Office Action does not show that each claim element was independently known in the prior art as discussed in *KSR v. Teleflex.* For this sole and independent reason, the rejection is improper and must be withdrawn.

    vi) As mentioned above in subsection a), Harsham, Nguyen and Pham are not properly combinable under §103 because these references teach away from each other. For this sole and independent reason, the rejection of Claim 1 is improper and must be withdrawn.

    vii) As mentioned above in subsection b), Harsham, Nguyen and Pham are not properly combinable under §103 because they are nonanalogous. For this sole and independent reason, the rejection of Claim 1 is improper and must be withdrawn.

    2) Independent Claim 12

    i) Claim 12 of the present application recites "ordered access rules." As discussed above, the Office Action does not describe (or even use the words) "ordered access rules", and the phrases "access rule" and "ordered access rule" *do not appear anywhere* in the Harsham, Nguyen, or Pham references. It is impossible for the Office Action to assert that Claim 12 is obvious over Harsham, Nguyen, and Pham if the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

    ii) Claim 12 of the present application recites an "access control list" configured to hold independent rule blocks having ordered access rules." As discussed above, the Office Action fails to use the term "access control list," and thus can't even attempt to explain how the access control list might be "configured to hold" independent rule blocks. Further, the Office Action doesn't apply any references to explain how the rule blocks might "hav[e] ordered access rules." As the Examiner does not apply *any* reference to teach how the access control list might "contain" or "hold" independent rule blocks, or how the independent rule blocks have "ordered access rules," the Office Action does not show that each claim element was

independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

iii)   Claim 12 of the present application recites that "if the access control list is empty, creating a new independent rule block and inserting the new access rule therein." As discussed above, the Office Action completely fails to discuss "creating a new independent rule block," "inserting" the block, or conditioning the insertion on the emptiness of a "list." Accordingly, the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

iv)   Claim 12 of the present application recites "a set of mapped independent rule blocks." Paragraph 11 of the Office Action asserts that this limitation is taught by Harsham at col. 4, lines 25-28. The cited text in Harsham states that, "[a]ccordingly, in the present invention, various logical groups of individual machines and groups of machines in the computer network may be defined" (Harsham, col. 4, ll. 25-18). The Examiner has not shown how the cited section of Harsham teaches "rule blocks" that are "mapped," "independent" or in a "set." The Examiner does not apply any other reference to teach "rule blocks" that are "mapped," "independent" or in a "set." Therefore, the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

v)   Claim 12 of the present application recites "a rule base," "a rule insertion engine," "merging the blocks," and "a subset of the set comprising those blocks for which a position for the new access rule can be determined". This claim language is not discussed *anywhere* in the text of the Office Action. It is impossible for the Office Action to assert that Claim 12 is obvious in view of Harsham, Nguyen, and Pham if the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

vi)   Claim 12 of the present application recites "merging the blocks in a subset of the set comprising those blocks for which a position for the new access rule can be determined, and inserting the new access rule therein." As discussed above, the Office Action completely fails to mention "inserting the new access rule" into the merged block, or "merging the blocks in a subset of the set comprising those blocks for which a position for the new access rule can be determined." Thus, the Office Action does not show that each claim element was independently known in the prior art, as discussed in *KSR v. Teleflex*. For this sole and independent reason, the rejection is improper and must be withdrawn.

vii)   As mentioned above in subsection a), Harsham, Nguyen and Pham are not properly combinable under § 103 because these references teach away from each other. For this sole and independent reason, the rejection of Claim 12 is improper and must be withdrawn.

viii)   As mentioned above in subsection b), Harsham, Nguyen and Pham are not properly combinable under § 103 because they are nonanalogous. For this sole and independent reason, the rejection of Claim 12 is improper and must be withdrawn.

2) Independent Claim 20

i)   Claim 20 of the present application recites "ordered access rules." As discussed above, the Office Action does not discuss (or even use the words) "ordered access rules" and the phrases "access rule" and "ordered access rule" *do not appear anywhere* in the Harsham, Nguyen, or Pham references. It is impossible for the Office Action to assert that Claim 20 is obvious over Harsham, Nguyen, or Pham if the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

ii)   Claim 20 of the present application recites an "access control list containing independent rule blocks having ordered access rules." As discussed above, the Office Action fails to even mention the term "access control list," and thus can't even attempt to explain

how the access control list might "contain . . ." independent rule blocks. As the Examiner does not apply *any* reference to teach how the access control list might "contain . . ." independent rule blocks, or how the independent rule blocks have "ordered access rules," the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

iii)   Claim 20 of the present application recites "creating a new independent rule block and inserting the rule therein if the list is empty." As discussed above, the Office Action completely fails to discuss "creating a new independent rule block," "inserting" the block, or conditioning the insertion on the emptiness of a "list." Thus, the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

iv)   Claim 20 of the present application recites "a set of mapped independent rule blocks." (emphasis added.) As discussed above, the Examiner has not shown how the cited section of Harsham teaches "rule blocks" that are "mapped," "independent" or in a "set." The Examiner does not apply any other reference to teach "rule blocks" that are "mapped," "independent" or in a "set." Therefore, the Office Action does not show that each claim element was independently known in the prior art. For this sole and independent reason, the rejection is improper and must be withdrawn.

v)   Claim 20 of the present application recites "merging the blocks in the set to form a new independent rule block and inserting the rule therein." As discussed above, the Office Action and Pham completely fail to mention "inserting the new access rule" into the merged block as recited by the claims. Thus, the Office Action does not show that each claim element was independently known in the prior art, as discussed in *KSR v. Teleflex*. For this sole and independent reason, the rejection is improper and must be withdrawn.

vi)   As mentioned above in subsection a), Harsham, Nguyen and Pham are not properly combinable under §103 because these references teach away from each other. For this independent reason, the rejection of Claim 12 is improper and must be withdrawn.

vii)   As mentioned above in subsection b), Harsham, Nguyen and Pham are not properly combinable under §103 because they are nonanalogous. For this sole and independent reason, the rejection is improper and must be withdrawn.
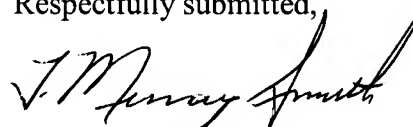
Dependent Claims

Claims 2-3 and 10-11, Claims 13-14 and 18-19, and Claim 21 and 23-25 respectively depend from Claim 1, Claim 12, and Claim 20, and are also believed to be distinct from the art of record, for example for the same reasons discussed above with respect to Claims 1, 12 and 20.

Conclusion

Based on the foregoing, it is respectfully submitted that all of the pending claims are fully allowable, and favorable reconsideration of this application is therefore respectfully requested. If the Examiner believes that examination of the present application may be advanced in any way by a telephone conference, the Examiner is invited to telephone the undersigned attorney at 972-739-8647.
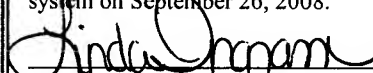
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